

Message

From: Fisher, Judy, NMENV [judy.fisher@state.nm.us]
Sent: 6/21/2018 7:06:12 PM
To: Crawford, Dorothy [Crawford.Dorothy@epa.gov]; Curran, Trisha [Curran.Trisha@epa.gov]
CC: mary.hilbert@state.nm.us; Verhalen, Frances [verhalen.frances@epa.gov]
Subject: RE: Exceptional Events - Initial event description in AQS

Thanks so much for your feedback Dot. We truly appreciate it.

From: Crawford, Dorothy [mailto:Crawford.Dorothy@epa.gov]
Sent: Thursday, June 21, 2018 12:31 PM
To: Fisher, Judy, NMENV <judy.fisher@state.nm.us>; Curran, Trisha <Curran.Trisha@epa.gov>
Cc: Hilbert, Mary, NMENV <mary.hilbert@state.nm.us>; Verhalen, Frances <verhalen.frances@epa.gov>
Subject: RE: Exceptional Events - Initial event description in AQS

Judy, On national call I asked about the AQS Event Descriptor. EPA's efforts to update AQS for the 2016 EER are still in progress. There will be AQS changes coming. Right now, current version of AQS, would allow you to put an Event Descriptor for 'R' flag but not for 'I' flag. In the future, after AQS updated for the 2016 EER, this will change. Thanks

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771

From: Crawford, Dorothy
Sent: Thursday, June 21, 2018 12:41 PM
To: 'Fisher, Judy, NMENV' <judy.fisher@state.nm.us>; Curran, Trisha <Curran.Trisha@epa.gov>
Cc: mary.hilbert@state.nm.us; Verhalen, Frances <verhalen.frances@epa.gov>
Subject: RE: Exceptional Events - Initial event description in AQS

Yes, the AQS Event Description was part of the 2016 EER (2016 Exceptional Event Rule).

Language from the Oct 3 2016 Federal Register (final rule promulgation) provides some guidance or background info:

'The proposal noted that because the flagging of data necessarily begins with the identification of an event, the EPA proposed to retain, with modifications, the AQS free-form text field for an initial event description. As is currently the practice, we would request that air agencies use the "initial event description" to identify a unique, real world event. We proposed to expand this "initial event description" to contain a unique event name; the type of the event (*e.g.*, high wind dust, volcanic eruption, other); a brief description of the event; and, to the extent known, the scope of the event in terms of geography and time (*e.g.*, likely affected area using latitude and longitude and a radius of influence and beginning day/time and ending day/ time). We proposed to simplify the process in AQS to allow the air agency to associate specific AQS sites and potentially affected monitors and specific data points with a given event as so described. We noted that this would enable air agencies and the EPA to "flag" or add qualifier codes to selected data in a single step rather than adding this information or the necessary codes on a per entry basis. Historically, when events have influenced the concentrations at multiple monitors for multiple days, the air agency has added initial event descriptions and set flags on each monitored concentration, sometimes resulting in hundreds of identical individual entries. The proposal noted that "associating" monitors with an event defined in time and space will save resources.'

'Initial event description (field in AQS)—provides a brief narrative of the event that could also include maps or graphs similar to what an air agency might include in the narrative conceptual model discussed in Section IV.G.6 of this preamble; the event description would include a qualitative description of the event and, at a minimum, briefly describe

the air agency's current understanding of interaction of emissions with the event, transport and meteorology (e.g., wind patterns such as strength, convergence, subsidence, recirculation) and pollutant formation in the area.'

I looked at the response to comments when we finalized the 2016 rule but did not find any supporting background info on the topic.

I have been keeping a weather-ear out for when EPA provides specific AQS program guidance on this topic. So far, I have not seen anything out of our national AQS group on this. Perhaps Trish has heard something from the national AQS group on this topic.

To date, the content of the AQS Event Description has not been a factor in any of my post-2016 EER EE Demonstration reviews. I have verified the flag existed but the Event Descriptor has not been a question or issue. I would say do the best you can with the language from the final preamble (above). If in the future, the AQS Event Descriptor for the 2015, 2016, 2017 PM10 exceedances in Luna and Dona Ana Counties, i.e., pending R6 review of EE Demonstrations submittals, becomes an issue, you should be able to update or change per EPA input at that time.

Sorry I cannot give you more guidance. Thanks for being diligent.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
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From: Fisher, Judy, NMENV [<mailto:judy.fisher@state.nm.us>]
Sent: Thursday, June 21, 2018 12:06 PM
To: Crawford, Dorothy <Crawford.Dorothy@epa.gov>; Curran, Trisha <Curran.Trisha@epa.gov>
Cc: mary.hilbert@state.nm.us
Subject: Exceptional Events - Initial event description in AQS

Good morning Dot,

After our call yesterday, the QA side of the house was looking at what we need to do as part of the initial notification process insofar as AQS is concerned. The answer to question A.3 in the "Draft 2016 Revisions to the Exceptional Events Rule: Update to Frequently Asked Questions" notes that we should create the event in AQS.

Part of the process of creating a new event in AQS is including a brief description of the event. It seems like brief descriptions for wild fire events are easier to come up with than those for high wind events. We want to make sure that you're getting the information that you need. Do you have guidance on or preference of what that brief description should include?

I'm including Trish on this because she might have some insight. Thanks to you both.

Judy

Judy Fisher
Quality Assurance Staff Manager
Air Quality Bureau
New Mexico Environment Department
Direct Phone 505.476.4314

judy.fisher@state.nm.com